

1 BRUCE SCOTT DICKINSON, ESQ.
Nevada Bar No. 002297
2 MICHAEL HOTTMAN, ESQ.
Nevada Bar No. 008501
3 JACQUELYN M. FRANCO, ESQ.
Nevada Bar No. 13484
4 **STEPHENSON & DICKINSON, P.C.**
5 2820 West Charleston Boulevard, Suite B-19
Las Vegas, Nevada 89102
6 Telephone: (702) 474-7229
7 Facsimile: (702) 474-7237
email: *admin@sdlawoffice.net*
8 Attorneys for Defendants

9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 MUHAMMAD IMRAN,

13 Plaintiff,

14 vs.

15
16 JAY D. ROBERTS; FUJIFILM NORTH
AMERICA CORPORATION; DOES I through
17 X, inclusive and ROE BUSINESS ENTITIES I
through X, inclusive,
18

19 Defendants.
20

CASE NO.: 2:14-cv-01532-JCM-NJK

STIPULATION AND ORDER

21 Plaintiff and Defendants, by and through their undersigned counsel, stipulate to the following:

- 22 1) Jay D. Roberts was 100% liable for the October 16, 2012 motor vehicle accident for failing to
23 use due care;
- 24 2) Because Mr. Roberts was in the course and scope of his employment with FujiFilm North
25 America Corporation at the time of the October 16, 2012 motor vehicle accident; FujiFilm is
26 100% liable as well;
- 27 3) Plaintiff's Cause of Action for Negligence Per Se is hereby dismissed with prejudice and
28 Paragraph Nos. 13 and 14 are stricken from the Complaint;

- 1 4) Plaintiff's Third Cause of Action (Negligent Entrustment / Joint & Several Liability /
 2 Agency) is dismissed with prejudice and stricken from the Complaint;
 3 5) As to the dismissals, each party will bear their own fees and costs; and
 4 6) The case against Mr. Roberts and FujiFilm will go forward on the issues of causation and
 5 damages only.

6 Dated this 22nd day of February, 2016.

7
 8 /s/ Anthony L. Ashby

9 RAMZY LADAH, ESQ.
 Nevada Bar No.: 011405
 10 ANTHONY L. ASHBY, ESQ.
 Nevada Bar No.: 004911
 11 LADAH LAW FIRM
 12 517 S. Third Street
 Las Vegas, NV 89101
 13 T: 702-252-0055
 14 F: 702-248-0055
 15 *Attorneys for Plaintiff*

Dated this 22nd day of February, 2016.

/s/ Michael Hottman

BRUCE SCOTT DICKINSON
 Nevada Bar No. 002297
 MICHAEL HOTTMAN, ESQ.
 Nevada Bar No. 008501
 JACQUELYN M. FRANCO, ESQ.
 Nevada Bar No. 13484
 2820 West Charleston Boulevard, Suite 19
 Las Vegas, Nevada 89102
 Telephone: (702) 474-7229
 Facsimile: (702) 474-7237
 Email: admin@sdlawoffice.net
 16 *Attorneys for Defendants*

17 **ORDER**

18 **IT IS SO ORDERED** February 24, 2016.

19 
 20 UNITED STATES DISTRICT JUDGE

21 ///

22 ///

23 ///

24 //

25 ///

26 ///

27 ///

28 ///

1 Submitted by:

2 STEPHENSON & DICKINSON, P.C.

3
4 Michael Hottman

5 BRUCE SCOTT DICKINSON, ESQ.

6 Nevada Bar No. 002297

7 MICHAEL HOTTMAN, ESQ.

8 Nevada Bar No. 008501

9 JACQUELYN M. FRANCO, ESQ.

10 Nevada Bar No. 13484

11 2820 West Charleston Boulevard, Suite B-19

12 Las Vegas, Nevada 89102

13 P: (702) 474-7229

14 F: (702) 474-7237

15 email: *admin@sdlawoffice.net*

16 Attorneys for Defendants